



FIRST NATIONAL BANK

BOX 610 • HENRYETTA, OK 74437-0610
TELEPHONE 918-652-4455
FAX 918-652-4450



Member F.D.I.C.

CLYDE O. ESTES
PRESIDENT
CHIEF EXECUTIVE OFFICER

F. Andrew Turley
Federal Election Commission
General Counsel's Office
999 E Street, NW
Washington, DC 20463

RE: MUR 4889

Gentlemen:

Henryetta is a small rural Oklahoma community with a population of less than 6,000. A City Council with the aid of a City Manager, operates its City Government. During the last City Council election, two incumbents were running for reelection who seemed to be doing a good job. I agreed to help them jointly raise funds for this endeavor, on a personal basis. Each candidate gave a list of names to me, of individual friends who had supported them previously. The list consisted of less than 90 names. This was not a mass mailing, but a limited private mailing.

The election was a small nonpartisan City Council election and did not involve the state or federal government. As you can see by a copy of my letter, I solicited for both candidates jointly and both incumbent candidates agreed to this. As a convenience to them, I had all funds directed to my attention and, unless otherwise stipulated by the contributor, funds were split evenly between the two candidates.

It was not my intention to have this letter placed on personal bank stationary, but in my haste to get it sent out, I failed to notice. My assistant assumed that the letters were to go on my stationary and after okaying the final draft of the letter (which was on plain paper), I left the office. The letters were then processed on Bank letterhead, signed with my signature stamp and mailed that afternoon.

All expenses including stamps, were paid by me and I have a personal canceled check for this.

I did not knowingly violate any law, state or federal. Using Bank letterhead was not appropriate, and I apologize for this.

I accept full personal responsibility for the letter. The letter was not discussed with, nor did it have the approval of the Bank's Board of Directors, or the Chairman of the Board. I have apologized to the Board and the Chairman also.

May 12 1999
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 24 3 16 PM '99



FIRST NATIONAL BANK

BOX 610 • HENRYETTA, OK 74437-0610
TELEPHONE 918-652-4455
FAX 918-652-4450



Member F.D.I.C.

CLYDE O. ESTES
PRESIDENT
CHIEF EXECUTIVE OFFICER

Incidentally, both of the candidates whom I supported in the letter lost the election.

Hopefully this correspondence will satisfy your request. If you have any other questions, feel free to call.

Yours Truly,

C. O. Estes, President and
Chief Executive Officer

COE:dm